

EX PARTE OR LATE FILED



**Building The
Wireless Future™**

July 2, 1996

CTIA

Cellular
Telecommunications
Industry Association
1250 Connecticut
Avenue, N.W.
Suite 200
Washington, D.C. 20036
202-785-0081 Telephone
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RECEIVED**JUL 2 1996**

Mr. William F. Caton
Secretary
Federal Communications Commission
1919 M Street, NW, Room 222
Washington, DC 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Re: Ex Parte Presentation
CC Docket No. 95-185 (Interconnection Between Local
Exchange Carriers and Commercial Mobile Radio
Service Providers) and CC Docket No. 96-98
(Implementation of the Local Competition Provisions in
the Telecommunications Act of 1996)

Dear Mr. Caton:

On Tuesday, July 2, 1996, the original of the attached letter and related summaries of interconnection agreements, were delivered to Michele Farquhar, Chief, Wireless Telecommunications Bureau. On the same day, copies of the information were delivered to FCC Chairman Reed E. Hundt, Commissioner James H. Quello, Commissioner Susan Ness, Commissioner Rachelle B. Chong and the Commission employees listed below:

Rosalind Allen
Lauren Belvin
James Casserly
James Coltharp
David Furth
Daniel Grosh
William Kennard
Kathleen Levitz
Elliot Maxwell
Ruth Milkman
Dan Phythyon
David Solomon
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Richard Metzger
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Pursuant to Section 1.1206 of the Commission's Rules, an original and one copy of this letter and the attachment are being filed with your office. If you have any questions concerning this submission, please contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "KD Simão". The signature is stylized with a large, looped "K" and "D" followed by the name "Simão".

Karen Denise Simao

Attachment



Building The
Wireless Future...

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CTIA

FEDERAL COMMUNICATIONS COMMISSION
July 2, 1996 OFFICE OF SECRETARY

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Randall S. Coleman
Vice President for
Regulatory Policy and Law

Ms. Michele Farquhar
Chief
Wireless Telecommunications Bureau
Federal Communications Commission
2025 M Street, NW, Room 5002
Washington, DC 20554

Re: CC Docket No. 95-185 (Interconnection Between Local
Exchange Carriers and Commercial Mobile Radio
Service Providers) and **CC Docket No. 96-98** ✓
(Implementation of the Local Competition Provisions in
the Telecommunications Act of 1996)

Dear Michele:

Per your request, I have attached two CTIA documents which summarize recently concluded interconnection agreements and the current or proposed state policies with respect to such agreements. With one exception, the agreement between Ameritech and Southwestern Bell Mobile Systems, the summarized interconnection agreements are between local exchange carriers (LECs) and competitive LECs (or CLECs).¹ The one-page document lists the states and their current or proposed approach to interconnection. The three-page document provides another perspective on the same information, summarizing the terms of specific LEC interconnection agreements. The attached information shows that:

1. Some states have sanctioned "bill and keep;"
2. Other states have proposed "bill and keep;"
3. Some states have approved or proposed "reciprocal compensation;"
4. Some states have not reviewed interconnection agreements; and
5. The listed interconnection rates are all substantially lower than previous rates.

¹ The one LEC-CMRS agreement (between Ameritech and Southwestern Bell Mobile Systems) that has been reviewed by state authorities was discussed in the June 7, 1996 letter of Thomas E. Wheeler, CTIA, to Chairman Hundt, FCC.



Significant variation exists among the states which have addressed interconnection, and so far only one state has addressed interconnection between a LEC and a wireless carrier. In fact, Connecticut and New York have advised CMRS carriers that they must submit themselves to state authority over CMRS pricing and entry as a *quid pro quo* for receiving interconnection rates equal to those granted to CLECs.

Because of the multistate character of wireless service areas, by design in the case of PCS and in response to consumer needs in the case of cellular, a uniform, national policy with respect to LEC-CMRS interconnection is needed. To surrender this important matter to state authority will only invite state interest in regulating CMRS rates and entry and result in conflicting state policies which will impede the ability of wireless carriers to compete with the local telephone monopoly.

Please contact me if you have any questions regarding the attached information.

Sincerely,

Randall S. Coleman

Attachments

STATES CURRENTLY SANCTIONING "BILL AND KEEP"	
	OREGON
	CALIFORNIA
	MICHIGAN
STATES PROPOSING "BILL AND KEEP"	
	WYOMING
	ARIZONA
	COLORADO
	OHIO
	OREGON
	VIRGINIA
	TEXAS
	WASHINGTON
STATES CURRENTLY SANCTIONING RECIPROCAL COMPENSATION	
	MARYLAND
	CALIFORNIA
	OHIO
	VIRGINIA
	KENTUCKY
	TENNESSEE
	MISSISSIPPI
	LOUISIANA
	ALABAMA
	GEORGIA
	NORTH CAROLINA
	SOUTH CAROLINA
	FLORIDA
	ILLINOIS
STATES PROPOSING RECIPROCAL COMPENSATION	
	OKLAHOMA

Interconnection Agreements

Local Exchange Carrier(LEC)	Commercial Mobile Radio Service(CMRS) Provider	Terms	States Covered	Rate (per minute)
Ameritech	Southwestern Bell Mobile Systems dba Cellular One	<ul style="list-style-type: none"> Reciprocal Compensation 	<ul style="list-style-type: none"> Illinois 	0.5¢ after a 3 year transition, but rate is available immediately for CLEC's.

Local Exchange Carrier(LEC)	Competitive Local Exchange Carrier(CLEC)	Terms	States Covered	Rate (per minute)
U S WEST	Electric Lightwave Inc. (ELI)	<ul style="list-style-type: none"> "Bill and Keep" for 24 months per Oregon PUC decision 	<ul style="list-style-type: none"> Oregon (Portland) 	"Bill and Keep"
Pacific Bell	ICG Access Services, Inc.	<ul style="list-style-type: none"> "Bill and Keep" per California PUC decision 	<ul style="list-style-type: none"> California 	"Bill and Keep"
GTE	Teleport Communications Group, Inc. (TCG)	<ul style="list-style-type: none"> "Bill and Keep" per California PUC decision 	<ul style="list-style-type: none"> California 	"Bill and Keep"
Ameritech	City Signal, Inc.	<ul style="list-style-type: none"> "Bill and Keep" unless there is a traffic imbalance greater than 5% per Michigan PSC decision 	<ul style="list-style-type: none"> Michigan 	"Bill and Keep"

Local Exchange Carrier(LEC)	Competitive Local Exchange Carrier(CLEC)	Terms	States Covered	Rate (per minute)
Bell Atlantic - MD	Metropolitan Fiber Systems (MFS), Inc. - MD	<ul style="list-style-type: none"> Reciprocal Compensation 	<ul style="list-style-type: none"> Maryland 	BA-MD pays: <ul style="list-style-type: none"> 0.3¢ MFSI-MD pays: <ul style="list-style-type: none"> 0.3¢ at BA-MD's end offices 0.5¢ at BA-MD's tandems
Pacific Bell	MFS Intelenet	<ul style="list-style-type: none"> Reciprocal Compensation Unbundled access to Bell loops Interim numbering portability 	<ul style="list-style-type: none"> California 	0.75¢
Ameritech	ICG Telecom Group (subsidiary of IntelCom Group)	<ul style="list-style-type: none"> Reciprocal Compensation ICG allowed to buy unbundled local loop services from Ameritech ICG access to Ameritech's poles and opreator services 	<ul style="list-style-type: none"> Ohio 	0.9¢
Bell Atlantic	Jones Intercable, Inc.	<ul style="list-style-type: none"> Calls exchanged directly between networks Higher charge if either company must transport the call Number portability for \$3 per month 	<ul style="list-style-type: none"> Virginia 	<ul style="list-style-type: none"> 0.7¢ for calls directly exchanged 0.9¢ if either company must transport call

Local Exchange Carrier(LEC)	Competitive Local Exchange Carrier(CLEC)	Terms	States Covered	Rate (per minute)
Ameritech	MFS Communications	<ul style="list-style-type: none"> • Reciprocal Local Call Termination • Physical interconnection at any "technically feasible point" • MFS access to Ameritech poles, ducts, and rights-of-way • MFS customers access to "911", and operator services (including Ameritech white pages listing) 	<ul style="list-style-type: none"> • Illinois • Michigan • Wisconsin • Indiana • Ohio 	0.9¢
BellSouth	Time Warner Communications	<ul style="list-style-type: none"> • Reciprocal Compensation • Deal caps compensation at 5% of the traffic differential to prevent either company from severe financial exposure • Non-discriminatory rates, terms and conditions for local interconnection • Interim number portability • Access to unbundled network elements 	<ul style="list-style-type: none"> • Kentucky • Tennessee • Mississippi • Louisiana • Alabama • Georgia • North Carolina • South Carolina • Florida 	1¢
BellSouth	MCImetro	<ul style="list-style-type: none"> • Terminating Compensation • Interim number portability • "911" Access • Directory listings • Exchange of "800" traffic 	<ul style="list-style-type: none"> • Georgia • Alabama • Florida • North Carolina • Tennessee 	GA: 1¢ AL: 1 ¢ FL: 1.1 ¢ NC: 1.3¢ TN: 1.9¢

Local Exchange Carrier(LEC)	Competitive Local Exchange Carrier(CLEC)	Terms	States Covered	Rate (per minute)
BellSouth	<ul style="list-style-type: none"> • Sprint Metro • Continental • Intermedia • Teleport 	<ul style="list-style-type: none"> • Reciprocal Compensaton • Deal caps compensation at 5% of the traffic differential to prevent either company from severe financial exposure • Interim Number Portability 	<ul style="list-style-type: none"> • Florida 	1.052 ¢
GTE	Intermedia	<ul style="list-style-type: none"> • Reciprocal Compensation • Interim Number Portability 	<ul style="list-style-type: none"> • Florida 	1.11136¢